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March 16, 2021

**VIA ELECTRONIC FILING**

**MEMORANDUM ENDORSEMENT**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: Viju Chacko v. Costco Wholesale Corporation  
Case No.: 19-CV-8051(GWG)**

Dear Judge Gorenstein:

This firm represents defendant/third-party plaintiff, Costco Wholesale Corporation ("Costco"), in the above-referenced matter. Pursuant to Your Honor's Individual Practices and the Order, dated March 15, 2021, we write to request an extension of the March 29, 2021, deadline to file motions for summary judgment. The request for an extension is submitted because the parties are working to schedule a private mediation for a date in mid to late-April. We had intended to advise Your Honor of the likely mediation at the Pre-Motion Conference.

**1) Dates Sought to Be Extended**

|                                           | <u>Current Deadline</u> | <u>Proposed Extended Deadline</u> |
|-------------------------------------------|-------------------------|-----------------------------------|
| Deadline to File Summary Judgment Motions | March 29, 2021          | April 28, 2021                    |

**2) Number of Previous Requests**

The parties have not previously requested an extension of Your Honor's deadline to file summary judgment motions.

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The Honorable Gabriel W. Gorenstein  
March 16, 2021  
Page 2

**3) Reason for Extension**

As stated above, the parties are working to privately mediate the case with National Arbitration and Mediation in mid to late-April. In connection with this, Costco and third-party defendant, Curti's Landscaping Inc. are negotiating a potential agreed-to liability split in advance of mediation. We request an extension of the motion deadline to allow the mediation to proceed and in order to preserve judicial resources until a point where it appears the case will not resolve and will proceed to motions and trial.

**4) Positions of the Parties**

The parties agree to this joint request for an extension.

Respectfully Submitted,



Samuel P. Quatromoni

Raphaelson & Levine Law Firm, P.C.

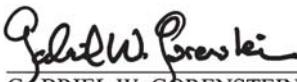
  
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Curti's Landscaping, Inc.

**Extension to April 28, 2021, granted.**

**So Ordered.**

  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
March 16, 2021